## 1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE DISTRICT OF ARIZONA 3 MDL NO. 2:15-MD-02641-PHX-DGC IN RE: Bard IVC Filters Products 4 STIPULATION OF DISMISSAL WITH **Liability Litigation PREJUDICE** 5 This document relates to the cases 6 listed on Exhibit A attached hereto. 7 8 COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto 9 ("Plaintiffs") and Defendants, C.R.Bard, Inc. and Bard Peripheral Vascular, Inc. 10 ("Defendants"), and file this Stipulation of Dismissal with Prejudice, and in support 11 thereof, respectfully show the court as follows: 12 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and 13 Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A with 14 prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are 15 to bear their own costs. 16 WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defindants hereby 17 respectfully request that the Court dismiss the caes listed on Exhibit A in their entirety 18 with prejudice to the re-filing of same and order that these parties are to bear their own 19 costs. 20 Respectfully submitted this 9<sup>th</sup> day of March, 2021 21 22 /s/ Ramon Rossi Lopez /s/ Richard B. North, Jr. Ramon Rossi Lopez Richard B. North, Jr. 23 rlopez@lopezmchugh.com richard.north@nelsonmullins.com LOPEZ McHUGH LLP **NELSON MULLINS RILEY &** 24

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**CERTIFICATE OF SERVICE** I hereby certify that on this 9<sup>th</sup> day March 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing. /s/ Marilyn B. Wass